

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

RATE ADJUSTMENT DUE TO)
EXTRAORDINARY OR EXCEPTIONAL) Docket No. R2013-11
CIRCUMSTANCES)

**MOTION OF
MPA—THE ASSOCIATION OF MAGAZINE MEDIA,
ASSOCIATION FOR POSTAL COMMERCE,
THE AMERICAN CATALOG MAILERS ASSOCIATION, INC.,
DIRECT MARKETING ASSOCIATION, INC.,
ALLIANCE OF NONPROFIT MAILERS,
ASSOCIATION OF MARKETING SERVICE PROVIDERS,
MAJOR MAILERS ASSOCIATION,
NATIONAL NEWSPAPER ASSOCIATION,
PRINTING INDUSTRIES OF AMERICA,
QUAD/GRAPHICS, INC., R.R. DONNELLEY,
SOFTWARE & INFORMATION INDUSTRY ASSOCIATION/
AMERICAN BUSINESS MEDIA, AND TIME INC.
FOR ISSUANCE OF FOURTH INFORMATION REQUEST
(November 6, 2013)**

Pursuant to 39 C.F.R. § 3001.21(a), the undersigned parties respectfully request that the Presiding Officer issue an Information Request to obtain answers to the questions stated in this motion. See 39 C.F.R. § 3007.3(c); Docket No. RM2008-4, Order No. 203 (April 16th, 2009) at 55 (recognizing the appropriateness of having the Commission retain the discretion to propound information requests proposed by third parties in dockets where the schedule is too tight to allow traditional discovery by intervenors). Each question is followed by an explanation of its importance.

24. Please produce full sources for the table of data on advertising expenditures produced in response to Presiding Officer's Information Request (POIR) No. 1, Question 9.

Explanation: This question concerns the two data tables produced in response to Presiding Officer's Information Request (POIR) No. 1, Question 9, on October 30, 2013. One table purports to show, among other things, total advertising expenditures in the United States. The Postal Service's October 30 filing failed to provide fully-sourced versions of the table, attributing it only to "Pivotal Research Group, U.S. Bureau of Economic Analysis, USPS RPW Reports." In a supplemental filing with the Commission on November 6, 2013, the Postal Service clarified that the data on advertising expenditures came from "Pivotal Research Group (2011-2012), MagnaGlobal (before 2011)."

These citations are still insufficient to enable third parties to test and verify the reported data on advertising spending. Pivotal Research Group and MagnaGlobal produce many reports. Moreover, the two entities are private companies; it is unclear that the reports cited by the Postal Service are generally available to the public. The Postal Service should be directed to produce copies of the actual reports on which it relies.

25. Please produce a fully-sourced version (in electronic format and showing all underlying calculations) of the graphs entitled "Actual vs. Potential GDP, 1991-2013" and "Output Gap (Actual GDP / Potential GDP - 1)," which the Postal Service produced in response to POIR No. 3, Question 1.

Explanation: This question concerns two graphs produced by the Postal Service in response to Presiding Officer's Information Request No. 3, Question 1, on November 1, 2013. The Postal Service offers these graphs to support its claim that the

2007-2009 recession has caused a persistent shortfall between actual and potential GDP in the years since 2009. These graphs are also inadequately sourced. The Postal Service did not provide a table of the underlying data, and attributed the graphs only to “U.S. Bureau of Economic Analysis, IHS Global Insight.” These entities publish numerous data series and reports. Moreover, IHS Global Insight is a private firm; it is unclear that the data from it are available to the public. Accordingly, we request that the Postal Service provide a fully-sourced version (in electronic format and showing all underlying calculations) of the data tables underlying these graphs no later than Friday, November 8.

CONCLUSION

Wherefore, the undersigned parties respectfully request that the Presiding Officer issue an Information Request to obtain answers to the questions stated in this motion.

Respectfully submitted,

Ian D. Volner
Matthew D. Field
VENABLE LLP
575 7th Street, N.W.
Washington, DC 20004
(202) 344-4000

*Counsel for Association for Postal
Commerce*

Hamilton Davison
President & Executive Director
THE AMERICAN CATALOG MAILERS
ASSOCIATION, INC. ("ACMA")
P.O. Box 41211
Providence RI 02940-1211
(800) 509-9515

*For The American Catalog Mailers
Association, Inc.*

Jerry Cerasale
Senior Vice President for Government
Affairs
DIRECT MARKETING ASSOCIATION, INC.
1615 L Street, N.W., Suite 1100
Washington DC 20036-5624
(202) 861-2423

For Direct Marketing Association, Inc.

David M. Levy
VENABLE LLP
575 7th Street, N.W.
Washington, DC 20004
(202) 344-4732

*Counsel for MPA – The Association of
Magazine Media and Alliance of Nonprofit
Mailers*

Ken Garner
President and CEO
ASSOCIATION OF MARKETING SERVICE
PROVIDERS
1800 Diagonal Road, Suite 320
Alexandria VA 22314-2806
(703) 836-9200

*For Association of Marketing Service
Providers*

Mury Salls
President
MAJOR MAILERS ASSOCIATION
DST Mailing Services
3531 Kilpatrick Lane
Snellville GA 30039

For Major Mailers Association

Tonda F. Rush
CNLC, LLC
PO Box 5737
Arlington VA 22205
(703) 237-9801

For National Newspaper Association

Joseph E. Schick
Director of Postal Affairs
QUAD/GRAPHICS, INC.
N61W23044 Harrys Way
Sussex WI 53089
(414) 566-4134

For Quad/Graphics, Inc.

Mike Hettinger
SOFTWARE & INFORMATION INDUSTRY ASS'N/
AMERICAN BUSINESS MEDIA
1090 Vermont Avenue, NW, Suite 600
Washington DC 20005
(202) 789-4456

*For Software & Information Industry
Association/American Business Media*

Michael Makin
President & CEO
PRINTING INDUSTRIES OF AMERICA
601 13th Street, N.W., Suite 350 South
Washington DC 20005-3807
(202) 730-7970

For Printing Industries of America

Anita Pursley
Vice President, Postal Affairs
RR DONNELLEY
107 Waters Edge
Dawsonville GA 30534
(404) 519-9505

For RR Donnelley

Timothy L. Keegan
BURZIO MCLAUGHLIN & KEEGAN
1054 31st Street N.W., Suite 540
Washington DC 20007-4403
(202) 232-0809

Counsel for Time Inc.

November 6, 2013